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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF
THEIR LETTER BRIEF IN
OPPOSITION TO WAYMO'S
MOTION TO COMPEL UBER TO
PRODUCE 1) TRAVIS KALANICK'S
TEXT MESSAGES AND PHONE AND
2) DOCUMENTS RESPONSIVE TO
WAYMO'S REQUEST FOR
PRODUCTION NO. 256**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal portions of their Letter Brief in Opposition to Waymo’s Motion to Compel Uber to Produce 1) Travis Kalanick’s Text Messages and Phone and 2) Documents Responsive To Waymo’s Request for Production No. 256. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief in Opposition to Waymo’s Motion to Compel (“Letter Brief”)	Highlighted Portions	Plaintiff (green)

The green-highlighted portions of the Letter Brief contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order. (Declaration of Michelle Yang in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Yang Decl.”) ¶ 3.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on August 10, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and designate the service copies of these documents as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”

1 Dated: August 10, 2017

MORRISON & FOERSTER LLP

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3 By: /s/Arturo J. González
ARTURO J. GONZÁLEZ

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5 UBER TECHNOLOGIES, INC.,
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7 TRUCKING LLC
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